

EXHIBIT 11

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff)
vs.) No. 1-19-CR-10080
GAMAL ABDELAZIZ and JOHN)
WILSON,)
Defendants.)

BEFORE THE HONORABLE NATHANIEL M. GORTON
UNITED STATES DISTRICT JUDGE
JURY TRIAL - DAY 9

John Joseph Moakley United States Courthouse
Courtroom No. 4
One Courthouse Way
Boston, Massachusetts 02210

September 21, 2021
9:10 a.m.

Kristin M. Kelley, RPR, CRR
Debra Joyce, RMR, CRR
Official Court Reporter
John Joseph Moakley United States Courthouse
One Courthouse Way, Room 3209
Boston, Massachusetts 02210
E-mail: kmob929@gmail.com

Mechanical Steno - Computer-Aided Transcript

1 MR. FRANK: Take the document down, please.

2 THE COURT: Take the document down.

3 MR. KENDALL: Okay. Take the document down.

4 Q. Does that refresh you as to the size of the class that was
5 admitted in 2014 with Mr. Wilson?

6 A. No.

7 Q. Okay. Mr. Wilson's suggested GPA was 3.87. Would you
8 agree with me that's high for a water polo walk-on?

9 A. I don't know off the top of my head.

10:53 10 Q. Well, you've been doing SUBCO admissions for how many
11 years?

12 A. Many.

13 Q. How many?

14 A. Probably 14 or 15.

15 Q. And in your -- based upon your 14 or 15 years experience
16 reviewing SUBCO applicants for water polo candidates, would you
17 agree with me that 3.87 is a pretty high grade point average
18 for a water polo candidate?

19 A. I wouldn't be able to speak to a specific sport, but yes.

10:53 20 3.87 would be a strong GPA among our student athletes. It's
21 not a very competitive GPA among our overall applicant pool and
22 our students that we admit.

23 Q. But for student athletes, put him up in maybe the top
24 20 percent or so for GPA's, rough numbers?

25 A. I just haven't looked at those data.

1 Q. Okay. And if they had a 29 on the ACT, would you agree
2 with me that would be a high score as well for water polo
3 walk-on candidates, correct?

4 A. Among all student athletes, that would appear to be a
5 stronger score, but, again, among our overall applicant pool,
6 it's not --

7 Q. I'm asking you about the athletes. Please limit your
8 answer to my question.

9 My question was for water polo walk-on candidates. A
10:54 10 29 is a high -- is a relatively high ACT score, correct? Yes
11 or no?

12 A. I can't answer that question.

13 Q. So after 15 years of looking at water polo walk-on files,
14 you have no memory of what's a good score or a not so good
15 score on the ACT for a water polo candidate?

16 A. You asked me specifically about water polo walk-ons, and
17 that's very specific. I don't feel comfortable, you know,
18 asserting something that I can't be sure of. I haven't
19 reviewed those data specifically.

20 Q. Okay. So for general athletic walk-ons, is 29 a pretty
21 good score?

22 A. I think it's fine. I think we see, you know, again,
23 students with above and below that among our recruited
24 walk-ons.

25 Q. But that's certainly in the top half, isn't it?

1 Q. And if Mr. Brunold -- Mr. Brunold never told you these
2 kids don't have any talent, we're just bringing them in for the
3 money.

4 A. No.

5 Q. He never said that to you?

6 A. No.

7 Q. So if that was going on, it was hidden from you, correct?

8 A. I had no knowledge of that.

9 Q. I had a different question.

11:46 10 If that was going on, it was hidden from you, correct?

11 MR. FRANK: Your Honor, I object. She had no
12 knowledge.

13 THE COURT: Sustained.

14 BY MR. KENDALL:

15 Q. If that was going on, then you would not include
16 Mr. Brunold when you said, "We do not take donations for
17 admissions."

18 MR. FRANK: Objection to the hypothetical.

19 THE COURT: He can ask that question.

11:46 20 A. The work of the SUBCO was to consider students for
21 athletic talent alone.

22 Q. That's your opinion.

23 MR. FRANK: Objection.

24 THE COURT: Sustained.

25 BY MR. KENDALL:

1 Q. Do you have a written rule that says that?

2 A. No, that is the expectations that all of the members of
3 the office of admission have around what happens at SUBCO.

4 Q. Well, when you say that's the expectation of all the
5 admissions officers, was there a vote taken of the admissions
6 officers and what their expectations were?

7 A. There were --

8 Q. Just a yes or no, was there a vote?

9 A. There was not a vote.

11:47 10 Q. Is there a written rule that everybody was given and said
11 this is compliance department, sign it, this is how you're
12 going to do your job, you can never consider donations as part
13 of a SUBCO admissions?

14 A. There is not a written rule.

15 Q. Okay. You agree with me this whole sort of college
16 admissions scandal has been a tremendous embarrassment to USC,
17 correct?

18 A. I was very unhappy to learn about it.

19 Q. I'm not asking your opinion. It's an embarrassment to all
11:47 20 of USC, correct?

21 A. Yes, I think that's fair to say.

22 Q. And you'd agree with me the last thing the USC admissions
23 department wants the world to think is that it was willing to
24 sell slots to people for money, correct?

25 A. The admission office was not willing to do that.

1 C E R T I F I C A T E

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4 UNITED STATES DISTRICT COURT)

5 DISTRICT OF MASSACHUSETTS)

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8 We, Kristin M. Kelley and Debra Joyce, certify that
9 the foregoing is a correct transcript from the record of
10 proceedings taken September 21, 2021 in the above-entitled
11 matter to the best of our skill and ability.

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14 /s/ Kristin M. Kelley

September 21, 2021

15 /s/ Debra Joyce

September 21, 2021

16 Kristin M. Kelley, RPR, CRR
17 Debra Joyce, RMR, CRR
Official Court Reporter

Date

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